



Control Number: 51415



Item Number: 524

Addendum StartPage: 0

SOAH DOCKET NO. 473-21-0538

PUC DOCKET NO. 51415

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2021 MAY 19 PM 2:01

APPLICATION OF SOUTHWESTERN
ELECTRIC POWER COMPANY FOR
AUTHORITY TO CHANGE RATES

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§

BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

**SOUTHWESTERN ELECTRIC POWER COMPANY'S SUPPLEMENTAL RESPONSE
TO TEXAS INDUSTRIAL ENERGY CONSUMERS' THIRTEENTH SET OF
REQUEST FOR INFORMATION**

MAY 19, 2021

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**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S SUPPLEMENTAL RESPONSE
TO TEXAS INDUSTRIAL ENERGY CONSUMERS' THIRTEENTH SET OF
REQUESTS FOR INFORMATION**

Question No. TIEC 13-2:

Please provide all responses to the 2017 and 2019 surveys identified on page 22 of Mr. Locke's testimony.

Supplemental Response No. TIEC 13-2

Please see TIEC 13-2 Highly Sensitive Supplemental Attachments 1 and 2.

The attachment responsive to this request is HIGHLY SENSITIVE under the terms of the Protective Order. Highly Sensitive information is available for review at the offices of Duggins Wren Mann & Romero, 600 Congress Avenue, Suite 1900, Austin, Texas, 78701, (512) 744-9300 ext. 1400, during normal business hours.

Prepared By: Charles J. Locke

Title: SPP, Dir Transmission Policy & Rates

Sponsored By: Charles J. Locke

Title: SPP, Dir Transmission Policy & Rates

**SOAH DOCKET NO. 473-21-0538
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TO TEXAS INDUSTRIAL ENERGY CONSUMERS' THIRTEENTH SET OF
REQUESTS FOR INFORMATION**

Question No. TIEC 13-4:

Please provide all SPP documents relating to or discussing the educational information referenced in the preceding RFI.

Supplemental Response No. Response No. TIEC 13-4:

Please see TIEC 13-4 Supplement Attachment 1 for the requested information. Please also see TIEC 13-4 Highly Sensitive Supplemental Attachment 2 for the Highly Sensitive materials responsive to this request.

Certain materials responsive to this request have been withheld as attorney/client and/or attorney work product privileged content. Pursuant to an agreement with counsel for TIEC, contemporaneously with filing this response, SWEPCO has also filed a privilege log identifying the documents that are covered by the attorney/client and/or attorney work product privilege and are not being produced.

The attachment responsive to this request is HIGHLY SENSITIVE under the terms of the Protective Order. Highly Sensitive information is available for review at the offices of Duggins Wren Mann & Romero, 600 Congress Avenue, Suite 1900, Austin, Texas, 78701, (512) 744-9300 ext. 1400, during normal business hours.

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Title: SPP, Dir Transmission Policy & Rates

Sponsored By: Charles J. Locke

Title: SPP, Dir Transmission Policy & Rates

From: Charles Locke
To: [Don Frerking](mailto:Don.Frerking@spp.org)
Subject: RE: BTMG Presentation
Date: Monday, January 4, 2021 11:33:00 AM
Attachments: [image001.png](#)

Guess I'm tripping over the word "need." Perhaps if the second sentence is worded as:
It might be helpful to sync such BTMG exceptions with future Order No. 2222 tariff provisions.

From: Don Frerking <dfrerking@spp.org>
Sent: Monday, January 4, 2021 11:25 AM
To: Charles Locke <clocke@spp.org>
Subject: RE: BTMG Presentation

Does this work?

ORDER NO. 2222 - TARIFF REQUIREMENTS

1. Allow DER aggregations to participate directly in market and establish DER Aggregators as a type of MP
2. Allow DER Aggregators to register DER aggregations under one or more participation models that accommodate the physical and operational characteristics of the DER aggregation
3. Establish minimum size requirement for DER aggregations that does not exceed 100 kW
4. Address locational requirements for DER aggregations
5. Address distribution factors and bidding parameters for DER aggregations
6. Address information and data requirements for DER aggregations
7. Address metering and telemetry requirements for DER aggregations
8. Address coordination between SPP, the DER Aggregator, the distribution utility and the relevant electric retail regulatory authority
9. Address modifications to the list of resources in a DER aggregation
10. Address MP Agreement for DER Aggregator

Size thresholds, IM participation, etc. are among the BTMG Network Load reporting provisions that have previously been discussed.

Any such possible BTMG exception provisions may need to sync with future Order No. 2222 tariff provisions.

 26

From: Don Frerking
Sent: Monday, January 4, 2021 10:56 AM
To: Charles Locke <clocke@spp.org>
Subject: RE: BTMG Presentation

Thanks. I'll do that.

From: Charles Locke <clocke@spp.org>
Sent: Monday, January 4, 2021 10:47 AM
To: Don Frerking <dfrerking@spp.org>
Subject: RE: BTMG Presentation

Don,

The presentation lays out the situation pretty well. I did make edits on a few slides, but nothing major.

However, I am somewhat concerned about the discussion of Order 2222, and especially slide 26. Currently, we do not have Tariff linkages between market registration and network load reporting, but the commentary on that slide suggests such may be needed. My preference would be to soften the point.

Charles

From: Don Frerking <dfreerking@spp.org>
Sent: Monday, January 4, 2021 1:13 AM
To: Charles Locke <clocke@spp.org>
Subject: BTMG Presentation

Charles,
Emily gave me a pass until noon on Monday. Please let me know if there is anything that I should edit or delete. I think Emily is going to put this at the end of the Staff Information Reports tentatively for 30 minutes. There's probably more than 30 minutes worth of stuff here, but I told her that I can probably make it fit to whatever time we have after she figure all of the other minutes on the agenda.

Don Frerking
Lead Engineer, Regulatory Policy
Southwest Power Pool
(501) 482-2459 office
dfreerking@spp.org

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From: [Don Frerking](#)
To: [Charles Locke](#)
Subject: RE: BTMG Presentation
Date: Monday, January 4, 2021 11:24:58 AM
Attachments: [image001.png](#)

Does this work?

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From: [Don Frerking](#)
To: [Charles Locke](#)
Subject: RE: BTMG Presentation
Date: Monday, January 4, 2021 10:56:03 AM

Thanks. I'll do that.

From: Charles Locke <clocke@spp.org>
Sent: Monday, January 4, 2021 10:47 AM
To: Don Frerking <dfreking@spp.org>
Subject: RE: BTMG Presentation

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From: Charles Locke
To: [Don Frerking](#)
Subject: RE: BTMG Presentation
Date: Monday, January 4, 2021 10:46:00 AM
Attachments: 13h - Update on MOPC Action Item 303 (BTMG - Network Load Reporting) v2.pptx

Don,

The presentation lays out the situation pretty well. I did make edits on a few slides, but nothing major.

However, I am somewhat concerned about the discussion of Order 2222, and especially slide 26. Currently, we do not have Tariff linkages between market registration and network load reporting, but the commentary on that slide suggests such may be needed. My preference would be to soften the point.

Charles

From: Don Frerking <dfrerking@spp.org>
Sent: Monday, January 4, 2021 1:13 AM
To: Charles Locke <clocke@spp.org>
Subject: BTMG Presentation

Charles,
Emily gave me a pass until noon on Monday. Please let me know if there is anything that I should edit or delete. I think Emily is going to put this at the end of the Staff Information Reports tentatively for 30 minutes. There's probably more than 30 minutes worth of stuff here, but I told her that I can probably make it fit to whatever time we have after she figure all of the other minutes on the agenda.

Don Frerking
Lead Engineer, Regulatory Policy
Southwest Power Pool
(501) 482-2459 office
dfrerking@spp.org

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From: [Carl Monroe](#)
To: [Don Frerking](#); [Steve Davis](#); [Derek Wingfield](#); [Charles Locke](#); [Tony Alexander](#)
Subject: RE: Behind-the-Meter Generation Survey Results
Date: Monday, October 7, 2019 6:04:12 PM
Attachments: 2019-10-07 BTMG Policy Suvey v1-1.pptx

Some of my edits... will send on to MOPC...

Carl

From: Don Frerking <dfrerking@spp.org>
Sent: Monday, October 7, 2019 1:46 PM
To: Carl Monroe <cmonroe@spp.org>; Steve Davis <sdavis@spp.org>; Derek Wingfield <dwingfield@spp.org>; Charles Locke <clocke@spp.org>; Tony Alexander <talexander@spp.org>
Subject: RE: Behind-the-Meter Generation Survey Results

Please review the presentation and provided any recommended edits.

Don

From: Don Frerking
Sent: Friday, October 4, 2019 11:52 AM
To: Carl Monroe <cmonroe@spp.org>; Steve Davis <sdavis@spp.org>; Derek Wingfield <dwingfield@spp.org>; Charles Locke <clocke@spp.org>; Tony Alexander <talexander@spp.org>
Subject: RE: Behind-the-Meter Generation Survey Results

I talked to Carl briefly about what he wanted to provide/discuss at MOPC. I'll put together a few brief slides that highlight the areas where there may be interest in pursuing a limited waiver for netting (i.e., retail that isn't Network or IM registered resource, etc.) and briefly note the issues that the respondents felt were irrelevant.

I'll update the charts to just show Transmission-Ownning Members and Transmission-Using Members. We can probably include those charts as an appendix to the presentation.

From: Carl Monroe <cmonroe@spp.org>
Sent: Friday, October 4, 2019 10:48 AM
To: Steve Davis <sdavis@spp.org>; Don Frerking <dfrerking@spp.org>; Derek Wingfield <dwingfield@spp.org>; Charles Locke <clocke@spp.org>; Tony Alexander <talexander@spp.org>
Subject: RE: Behind-the-Meter Generation Survey Results

I am out next week.. if we need to has to be today... I will need a presentation for MOPC by Monday... Can we take his compliation and make some slide? I would probably just do TO and TUM and the TO(TUM) would be added to the Non-TO TUM. Also any general trends from the comments.

Don, can you start some slides or Steve?

Carl

From: Steve Davis <sdavis@spp.org>
Sent: Friday, October 4, 2019 10:09 AM
To: Don Frerking <dfreerking@spp.org>; Carl Monroe <cmonroe@spp.org>; Derek Wingfield <dwingfield@spp.org>; Charles Locke <clocke@spp.org>; Tony Alexander <talexander@spp.org>
Subject: RE: Behind-the-Meter Generation Survey Results

This looks great, Don. Taking a quick view of the responses, it looks like we still have a lot of debate. It feels we could garner support for a **small exception for behind the retail meter if the gen is at the same location as the load, regardless of PURPA or fuel type, without aggregation allowances and regardless of any interconnection agreements.** I'm not surprised the length of use didn't matter, but am a bit surprised they didn't care if the gen was synchronized or not.

Should we try to get together and go over the results?

From: Don Frerking <dfreerking@spp.org>
Sent: Thursday, October 3, 2019 4:27 PM
To: Carl Monroe <cmonroe@spp.org>; Derek Wingfield <dwingfield@spp.org>; Charles Locke <clocke@spp.org>; Steve Davis <sdavis@spp.org>; Tony Alexander <talexander@spp.org>
Subject: RE: Behind-the-Meter Generation Survey Results

I'm working on a high level summary of the results and comments, but the attached file contains the responses and comments by respondent for each question.

FYI we did get only one response from each entity with affiliates (i.e, 1 from Evergy, 1 from AEP, 1 from Sunflower, etc.).

Let me know if you have questions or recommendations.

From: Carl Monroe <cmonroe@spp.org>
Sent: Monday, September 30, 2019 9:02 PM
To: Don Frerking <dfreerking@spp.org>; Derek Wingfield <dwingfield@spp.org>; Charles Locke <clocke@spp.org>; Steve Davis <sdavis@spp.org>; Tony Alexander <talexander@spp.org>
Subject: RE: Behind-the-Meter Generation Survey Results

Don, et.al,

Who would like to take a shot at drafting a summary we can use with the MOPC? Probably need a draft by Thursday so we can look at a presentation to post with MOPC on Tuesday of next week? Too soon?

Carl

From: Don Frerking <dfreerking@spp.org>
Sent: Friday, September 27, 2019 3:50 PM
To: Derek Wingfield <dwingfield@spp.org>; Carl Monroe <cmonroe@spp.org>; Charles Locke <clocke@spp.org>; Steve Davis <sdavis@spp.org>; Tony Alexander <talexander@spp.org>
Subject: RE: Behind-the-Meter Generation Survey Results

That worked. Thanks

From: Derek Wingfield <dwingfield@spp.org>
Sent: Friday, September 27, 2019 3:47 PM
To: Don Frerking <dfreerking@spp.org>; Carl Monroe <cmonroe@spp.org>; Charles Locke <clocke@spp.org>; Steve Davis <sdavis@spp.org>; Tony Alexander <talexander@spp.org>
Subject: RE: Behind-the-Meter Generation Survey Results

Sorry about that, I apparently left a box unchecked in the survey's configuration that was keeping you from being able to access that part of the report. If you try again, it should work now. (You may have to refresh.)

Derek

From: Don Frerking <dfreerking@spp.org>
Sent: Friday, September 27, 2019 3:31 PM
To: Derek Wingfield <dwingfield@spp.org>; Carl Monroe <cmonroe@spp.org>; Charles Locke <clocke@spp.org>; Steve Davis <sdavis@spp.org>; Tony Alexander <talexander@spp.org>
Subject: RE: Behind-the-Meter Generation Survey Results

Derek,

When I click the "Response Total", it is asking for a login. Is that something I can get access to?

Thanks,
Don

From: Derek Wingfield <dwingfield@spp.org>
Sent: Friday, September 27, 2019 3:25 PM
To: Carl Monroe <cmonroe@spp.org>; Don Frerking <dfreerking@spp.org>; Charles Locke <clocke@spp.org>; Steve Davis <sdavis@spp.org>; Tony Alexander <talexander@spp.org>
Subject: Behind-the-Meter Generation Survey Results

All –

Reponses to the MOPC policy survey are still coming in, but I thought I'd go ahead and pass along this link to the results:

https://app.keysurvey.com/report/1435434/1145096/99e3eaf5?Dir=&Enc_Dir=1e2cbdae&av=lxnlBAm77ac%3D&afterVoting=ef0a9f0c05e6

As of this afternoon, 36 surveys have been completed and another 7 are currently in progress.

The link will take you to a web-based report where you can see yes/no responses to each question as well as the associated open-ended comments. The report will update itself automatically as more responses are submitted. You can click on the number in the "Response total" column to see results displayed by individual respondent. (In other words, you can see from that screen how a particular individual answered each question.)

There are also buttons at the bottom of the screen that you can use to export the results to PDF or Excel, or to apply filters to the report based on respondents' answers to particular questions.

Let me know if you need anything else related to the survey responses.

Derek

Derek Wingfield

Supervisor, Corporate Communications

Southwest Power Pool

501-614-3394 | dwingfield@spp.org

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From: Don Frerking
To: Charles Locke
Subject: BTMG Presentation
Date: Monday, January 4, 2021 1:13:20 AM
Attachments: 13h - Update on MOPC Action Item 303 (BTMG - Network Load Reporting).pptx

Charles,

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From: bounce-54455-91117@spplist.spp.org on behalf of [Gayle Freier](#)
To: [SPP BDTF \(Exploder\)](#)
Subject: Network Load update to SPC
Date: Wednesday, October 19, 2016 4:40:59 PM
Attachments: BDTF update to SPC on MOPC Action Item 239 - Determination of Network Load (2) .pptx

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**SOUTHWESTERN ELECTRIC POWER COMPANY'S SUPPLEMENTAL RESPONSE
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REQUESTS FOR INFORMATION**

Question No. TIEC 13-10:

Identify all other SPP network customers that have load served by retail BTM generation but have not reported it as part of monthly network load in the past 5 years.

Supplemental Response No. TIEC 13-10:

Network Customers are obligated to report Network Load to SPP in accordance with the SPP Open Access Transmission Tariff ("Tariff"); therefore, the information available to SPP with regard to Network Load is based upon what is reported, not what isn't reported. Furthermore, the Tariff does not require Network Customers to report Network Load on a disaggregated basis to provide data for each and every generating resource and metering point.

Prepared By: Charles J. Locke

Title: SPP, Dir Transmission Policy & Rates

Sponsored By: Charles J. Locke

Title: SPP, Dir Transmission Policy & Rates